

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

EUGENE SCALIA,
SECRETARY OF LABOR,
UNITED STATES DEPARTMENT OF LABOR,

Plaintiff,

v.

AA TO ZZ CHILD CARE AND LEARNING
CENTER, INC.
d/b/a AA TO ZZ CHILD CARE, a corporation;
ASHLEIGH ZIMMERMAN and
RYAN ZIMMERMAN

Defendants.

Civil Action No. 19-00372

MOTION TO APPROVE AND ENTER CONSENT JUDGMENT

Plaintiff hereby moves this Court to Approve and Enter the Consent Judgment against Defendants, as agreed to by the parties. In support thereof, the Secretary represents that the parties have reached an agreement for the purpose of settling the above-referenced matter. The terms of this agreement are set forth in the Consent Judgment attached hereto as Exhibit A, which has been signed by Defendants.

WHEREFORE, for the reasons set forth above, the Secretary respectfully requests that the Court enter the Consent Judgment attached hereto.

Respectfully submitted,

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**UNITED STATES DEPARTMENT OF
LABOR**

Kate S. O'Scannlain
Solicitor of Labor

Oscar L. Hampton III
Regional Solicitor

/s/ M. del Pilar Castillo

M. del Pilar Castillo

Attorney

PA ID # 311251

CERTIFICATE OF SERVICE

I certify that on June 26, 2020, I electronically filed the foregoing *Motion to Approve and Enter Consent Judgment* with the Clerk of Court by using the CM/ECF system, which will provide notice and an electronic link to this document to the following attorneys of record:

Michael Follett

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/s/ M. del Pilar Castillo

M. del Pilar Castillo